

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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JOHN J. VAUGHN, GERALD A. :  
KALBFLEISCH, MICHAEL HATHAWAY and :  
MYRTLE HATHAWAY, :  
  
Plaintiffs, : Civil Action  
v. : No. 04-10988-GAO  
  
PUTNAM INVESTMENT MANAGEMENT, :  
LLC and PUTNAM RETAIL MANAGEMENT :  
LIMITED PARTNERSHIP, :  
  
Defendants. :  
-----X  
JOHN J. VAUGHN, GERALD A. :  
KALBFLEISCH, MICHAEL HATHAWAY, and :  
MYRTLE HATHAWAY, :  
  
Plaintiffs, : Civil Action  
v. : No. 06-11438-GAO  
  
PUTNAM INVESTMENT MANAGEMENT, :  
LLC and PUTNAM RETAIL MANAGEMENT :  
LIMITED PARTNERSHIP, :  
  
Defendants. :  
-----X

**DEFENDANTS' ASSENTED-TO MOTION FOR LEAVE TO  
SUBMIT A REPLY MEMORANDUM IN SUPPORT OF THEIR  
MOTION TO STAY CIV. NO. 06-11438-GAO ("*VAUGHN II*") PENDING  
THIS COURT'S RESOLUTION OF CIV. NO. 04-10988-GAO ("*VAUGHN I*")**

Pursuant to Local Rule 7.1(B)(3), Defendants Putnam Investment Management, LLC and Putnam Retail Management Limited Partnership (collectively "Defendants") respectfully move this Court for leave to file a reply memorandum in further support of their motion to stay Vaughn I pending this Court's resolution of Vaughn II. As grounds for this motion, Defendants submit that the reply memorandum will respond to arguments and authorities

presented by Plaintiffs' opposition, and that it contains analysis and authorities that will assist the Court in its consideration of Defendants' Motion to Stay. The proposed reply memorandum is attached hereto as Exhibit 1.

WHEREFORE, Defendants respectfully request that this Court grant Defendants leave to submit the reply memorandum in further support of their motion to stay.

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

The undersigned hereby certifies that Defendants' counsel has conferred with counsel for Plaintiffs, who assent to the relief sought by this motion.

Dated: November 22, 2006  
Boston, Massachusetts

Respectfully submitted,

/s/ James R. Carroll  
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Counsel for Defendants Putnam Investment  
Management, LLC and Putnam Retail  
Management Limited Partnership

**CERTIFICATE OF SERVICE**

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on November 22, 2006.

November 22, 2006

/s/ Scott T. Lashway  
Scott T. Lashway